

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

RICK DEES

Plaintiff

vs.

KENWOOD DEALER GROUP

and

KINGS DODGE

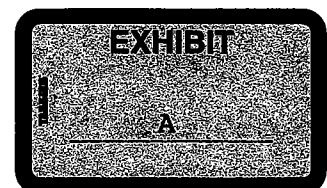
Defendants

CASE NO. C-1-02-457
Judge Dlott

DECLARATION OF
MIKE SUNDERMAN

I, Mike Sunderman, declare as follows:

1. I am Mike Sunderman, Sales Manager of Jake Sweeney Chrysler Plymouth, 85 W. Kemper Road, Cincinnati, Ohio 45246.
2. I offer this declaration in support of Plaintiff's claim in the above captioned matter.
3. Rick Dees was employed as a car salesman for Kingswood Chrysler Plymouth for almost 2 years. I was his manager.
4. Karl Swartz was also employed as a car salesman during the same time period and I also was his manager.
5. If I had to choose between Rick Dees and Karl Swartz for the job of Finance and Insurance Manager I would have chosen Rick Dees for the following reasons:



a. Rick's paperwork was always in good order, legible, and in conformity with what was necessary and required whereas Karl was more disorderly with respect to his paperwork.

b. Because of his health problems, Karl's attendance was not as good as Rick's.

c. Rick was a better sales person than Karl and the Finance and Insurance job requires most of all a good salesperson.

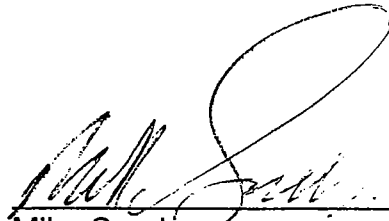
d. Rick was more capable and efficient overall.

6. I never had complaints about Rick's work and he was well regarded by the other salespeople and other managers.

7. I never observed any difficulty of Rick with "math problems" and he always completed the mathematical part of his paperwork without error.

Pursuant to 28 U.S.C. Section 1746 I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 12, 2003.


Mike Sunderman